

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

D. B.,)
Plaintiff,)
)
v.) Case No.: 4:12-CV-00654-JAR
)
)
ST. CHARLES COUNTY, MISSOURI;)
and JASON KING,)
Defendants.)

**DEFENDANT ST CHARLES COUNTY'S
MOTION FOR SUMMARY JUDGMENT**

Pursuant to F.R.Civ P. 56(a), Defendant St. Charles County moves this Court for an order entering summary judgment in its favor and dismissing Plaintiff's action against it with prejudice. As grounds for this motion, Defendant County states the following:

1. Based upon the undisputed facts in the record before this Court and the law applicable to those facts, St. Charles County is entitled to summary judgment on Plaintiff's claims against this Defendant.
2. In support of this motion, Defendant St. Charles County relies upon its memorandum in support of this motion, its statement of uncontested material facts, and upon the documents submitted in support thereof.

WHEREFORE, Defendant St. Charles County prays this Court enter an order granting summary judgment and dismissing Plaintiff's action against it with prejudice and awarding Defendant County such further relief as this Court deems proper.

Respectfully Submitted,

OFFICE OF THE ST CHARLES
COUNTY COUNSELOR

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CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2013, a copy of the above and foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to:

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